

**UNITED STATES DISTRICT COURT FOR THE
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

UNITED STATES OF AMERICA

v.

**JACK STEPHEN PURSLEY,
AKA STEVE PURSLEY**

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**CRIMINAL NO. 4:18-CR-575
(HUGHES)**

**GOVERNMENT’S NOTICE OF INTENT TO INTRODUCE EVIDENCE
PURSUANT TO FEDERAL RULE OF EVIDENCE 404(b)**

The United States of America, by and through undersigned counsel, hereby files this Notice of Intent to Introduce Evidence Pursuant to Federal Rule of Evidence 404(b).

From 2007 through 2009, Pursley structured the movement of millions of dollars from bank accounts in the Isle of Man to accounts in the United States, which were held by United States corporations owned by Pursley and Co-Conspirator 1. One of the companies used to receive offshore funds was Gulf States Management Company (“Gulf States”). Gulf States had multiple bank accounts, including Washington Mutual/Chase account XXXX1563-0 (“Account 1”) and Charles Schwab account XXXX-1072 (“Account 2”) (collectively, “the Accounts”). Pursley was the signatory on both of the Accounts.

At the same period of time in which Pursley was illegally repatriating his portion of Co-Conspirator 1’s funds from the Isle of Man utilizing accounts in the name of Gulf States, Pursley also utilized Gulf States and the Accounts in a business arrangement with Christopher Carrillo and his wife, Lisa Carrillo (“the Carrillos”). The structure of the transaction is similar to that used to repatriate Co-Conspirator 1’s funds. Beginning in or about June 2006, Pursley and the Carrillos entered into a business relationship to flip houses that they had renovated. Pursley provided a

corporation by the name of Global Publishing Corporation (“Global Publishing”), for which Lisa Carrillo and Pursley’s wife, Amber Pursley, and a Jose Carrillo (no relation) were the shareholders. According to the Carrillos, the company was capitalized with money from Pursley. The Carrillos did not invest any money into the enterprise. Global Publishing’s internal records, however, indicate that a third party by the name of “Jose Carrillo” (no relation) purportedly invested approximately \$552,000 (in three tranches in October, November, and December 2006) in exchange for stock in Global Publishing.

In or about October 2007, at Pursley’s direction, Global Publishing purchased approximately 88,000 shares of stock for \$528,000 in Gulf States. Shortly thereafter, on or about November 8, 2007, Lisa Carrillo, again at Pursley’s direction, transferred approximately \$528,000 to Gulf States’s Account 1. These funds were then transferred from Account 1 to Gulf States’s Account 2, and were subsequently used in December 2007 to purchase two properties.

In 2008, the Carrillos and Pursley sold the investment properties for a profit. The proceeds were placed in Account 2, which was again was nominally owned by Gulf States. The Carrillos then received from Gulf States approximately \$115,000, representing their portion of the profit. The remaining funds in Account 2 were later deposited into Pursley’s E-Trade account XXXX4096, his IOLTA account at First Bank/Prosperity #XXXX0300, and his account at First Bank/Prosperity XXX11467. The Government is unaware of any repayment of Jose Carrillo. The sale of the properties was not reported to the IRS by Gulf States.

The documents related to Global Publishing were produced to the defense on October 2, 2018, and the memoranda of interviews of the Carrillos were produced on October 23, 2018.

The Government will offer this evidence under Rule 404(b) of the Federal Rules of Evidence to show knowledge, intent, *modus operandi*, and plan.

DATED: November 1, 2018

Respectfully Submitted,

RYAN K. PATRICK
United States Attorney
Southern District of Texas

By: /s/ Nanette L. Davis
Nanette L. Davis, Senior Litigation Counsel
Nanette.L.Davis@usdoj.gov
Grace E. Albinson, Trial Attorney
Grace.E.Albinson@usdoj.gov
Sean P. Beaty, Trial Attorney
Sean.P.Beaty@usdoj.gov
U.S. Department of Justice, Tax Division
601 D Street, N.W., Room 7634
Washington, DC 20004
(202) 514-8030/616-3311/616-2717

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on November 1, 2018, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all counsel of record.

By: /s/ Nanette L. Davis
Nanette L. Davis, Senior Litigation Counsel
Nanette.L.Davis@usdoj.gov
Grace E. Albinson, Trial Attorney
Grace.E.Albinson@usdoj.gov
Sean P. Beaty, Trial Attorney
Sean.P.Beaty@usdoj.gov
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